

CHAPTER 7: PUBLIC FACILITIES AND SERVICES

Comment:	Staff Response:
<p>Received on: 07/12/06 Received from: Anonymous Received via: Open House</p> <p>Have waste disposal sites fenced & policed. A lot of material that is disposed in green boxes can be recycled.</p>	<p>Refer to Policy P.25.5</p> <p>Add Policy P.25.8: <i>Impacts to the local community of green box collection sites should be mitigated at the time of reconstruction or expansion of the facility. This should include visual screening, safety improvements and dust mitigation.</i></p>
<p>Received on: 07/17/06 Received from: Anonymous Received via: Open House</p> <p>Landfill is growing faster than all predictions & planning is dragging. Recycling must be more strongly implemented not just encouraged. Far too many local businesses bring truckloads of cardboard to the landfill. They should be charged by volume. This would “encourage” them crush & recycle. This includes Sportsman Ski Haus, furniture stores, appliance stores & others. By the way, where is the glass crusher we were told was coming? This would reduce volume!</p>	<p>Refer to Goals 25 and 26 as well as accompanying policies.</p> <p>Comment was forwarded to the Flathead Solid Waste District who has control over specific details of landfill operation procedures.</p>
<p>Directing development: One method of directing development is through use of sewer and water districts. I’d like to see this considered in the draft plan.</p>	<p>See page 82 – Change P.27.1 to: <i>“Encourage high density development in areas that will be served by public sewer systems.”</i></p>
<p>All developers must be treated equally and not on a case by case basis. Sewer, water and costs of new fire stations, additional sheriff personnel, etc. must be included in this cost.</p>	<p>See pg. 132 – Fiscal Implementation. No changes to draft needed.</p>
<p>Finally, DNRC would like the County to delineate the areas within their jurisdiction that constitute wildland urban/residential interface (WUI) concerning wildland fire risk. Although Flathead County has completed their County Wildfire Protection Plan (CWPP) concerning this issue, there should be a link between the CWPP and the Growth Policy. Within the areas designated as WUI, DNRC would like to see the County develop a plan that at a minimum addresses ingress, egress, water supply, and defensible space. DNRC can help provide guidelines and minimum standards concerning this issue.</p>	<p>Please see pg 151 – Statement of Coordination. No changes to draft needed.</p>
<p>Health and safety issues should also be quantified. This includes wastewater systems and storm runoff. Increased population and density dramatically affect both. All developments should have provision to accommodate increased surface runoff and wastewater systems. The threat of fire, both domestic and wildfire are important. We need significant increases in fire protection equipment and capability as developments spread throughout previously unoccupied land and habitat density</p>	<p>Goals G.27 and G.29 address wastewater.</p> <p>Goal G.36 in Chapter 8 addresses stormwater.</p> <p>Fiscal Implementation is addressed on page 132.</p>

increases. Provisions must be made for funding of the equipment and manpower necessary to fight fire as well as access for the equipment to all rural and densely populated areas. Water or other fire suppression elements must be adequate and available for both cases.	No changes to draft needed.
<p>Page 84 P.29.2 and 29.3</p> <p>The State has standards and regulations for septic installation. Why would the County require alternative septic technology and require a County maintenance and management program? This will create one more bureaucracy that the taxpayers/septic owners will need to fund. Your suggestion of educational brochures to home buyers/owners and contractors seems more reasonable.</p>	<p>Disagree. County wide septic management will monitor for failing septic systems, etc.</p> <p>No changes to draft needed.</p>
<p>Pg 82 Policy 27.1 indicates that dense development should be allowed "only" on "public sewer systems that treat to municipal standards." This idea also occurs in Policy 35.4 (pg.106). Why are "municipal" standards required? Are those the only acceptable set of standards? I am not a wastewater engineer, but I doubt that they are the only acceptable standards. I also do not think this growth policy should express or imply that municipal standards, or any other set of standards, are the best. This policy statement may be interpreted by some in our community to require connection to municipal treatment systems, which is not what I believe you want to say.</p> <p>Pg 83 The phrase "<u>susceptible to potential</u> contamination" in Policy 27.8 is too broad. Please consider other language.</p> <p>Policy 27.10 really needs to be reconsidered. You should be "encouraging," not "restricting," public sewer systems in areas not subject to future municipal connection. The planning area for Flathead County is enormous and most parts of it will not, at any foreseeable time in the future, be in close proximity to municipal systems. That does not mean, however, that those areas should not develop. Most residents of Flathead County, want to live outside the cities; sometimes, substantial distances from them. This policy seems to indicate that individual septic systems would service such rural developments--something I am sure the County would rather avoid.</p>	<p>Change P.27.1 to: "<i>Encourage high density development in areas that will be served by public sewer systems.</i>"</p> <p>Change statement to: "<i>susceptible to contamination.</i>"</p> <p>Add on end of P.27.10: "<i>Such community systems encourage higher density use of rural lands inappropriately far from community infrastructure.</i>"</p>
<p>p. 82: I guess I understand why folks accept a buffer around a landfill more readily than in other land use designations, but earlier, the document seemed to really underplay the buffer concept. It is certainly appropriate for other resources/uses, e.g. industrial, wetlands, etc.</p> <p>p. 83, P.27.8 It would be good to have an</p>	<p>No changes to draft needed.</p> <p>Staff suggests that Planning Board define</p>

<p>understanding of what is meant by “protection zones” and “low-intensity development”.</p> <p>p.83, P.27.9: Replace “discouraged” with “restricted”.</p> <p>p. 84, P.30.3: Wording is confusing: “use determine incentives for”</p> <p>p. 96: After reading the paragraph about Projected Trends, I was left with the thought, “....And???” Same on the next section, on Schools...these sections do not tie together with recommendations.</p>	<p>“protection zones” and density classifications.</p> <p>Staff disagrees. No changes to draft needed.</p> <p>Add “and” after “district” and strike “<i>determine.</i>”</p> <p>Staff disagrees. No changes to draft needed.</p>
<p>Please add to P.25.7, “Ensure that programs for junk vehicle collection and disposal are available and encourage stricter enforcement for existing laws.”</p> <p>Chapter 7, Public Facilities & Services, is well done. Appreciate the attention paid to the shallow aquifer but suggest the following: Owners of septic systems 20 years or older be required to attest their system is not a threat to public health and provide the methods for checking.</p> <p>Page 97, appreciate the need for including the impact of development on schools.</p>	<p>Staff agrees. Add “<i>and encourage stricter enforcement for existing laws.</i>”</p> <p>Implementation from the Environmental Health Department is outside of the scope of this document. No changes to draft needed.</p> <p>Thank-you.</p>
<p>Chapter 7, Public Facilities and Services, Page 83 Policy P.27.10 seeks to, “Restrict community and public sewer systems which are not subject to future connection to a municipal wastewater system.” This seems to conflict with the goal of clustering housing on a parcel so that a larger remainder can be left in wildlife habitat, agricultural production or open space. The logical outcome of this policy is large lot development that eats up open space and encourages noxious weeds instead of encouraging clusters of homes with centrally located, small community wastewater treatment systems.</p>	<p>Add on end of P.27.10: “<i>Such community systems encourage higher density use of rural lands inappropriately far from community infrastructure.</i>”</p>
<p>Flathead Lake, all river tributaries, the shallow aquifer need to be a priority where development is concerned. The current treatment plant has to be at its capacity? Whereas any future large scaled developments on individual septs will eventually compromise the water quality of Flathead Lake. Also by increasing additional septs will contribute a water quality and quantity issue over the shallow aquifer lands.</p>	<p>See goals and policies of Chapter 7. Prioritizing the implementation methods in the 2006 Growth Policy will be strongly determined by the public and political will and the resources available to the county.</p>
<p>P27.1 - “Allow dense development only in areas that will be served by public sewer systems that treat to municipal standards.”</p> <p>P27.10 - “Restrict community and public sewer systems which are not subject to future connection to a municipal wastewater system.” These two provisions specifically disallow and</p>	<p>Change P.27.1 to: “<i>Encourage high density development in areas that will be served by public sewer systems.</i>”</p> <p>Add on end of P.27.10: “<i>Such community systems encourage higher density use of rural lands inappropriately far from community infrastructure.</i>”</p>

<p>restrict higher density clustering of homes in exchange for the preservation of open space. Dense development is not the enemy and the problem. Poor design and poor implementation is the problem. By restricting density and limiting density to public municipal sewer systems we are not encouraging better design. We are actually encouraging more poor design.</p> <p>P.27.6 - The county already requires pressure dosed septic systems. I wonder what this additional "requirement" is? Is it level 2 treatment? This is not clear and if it is intended to be a requirement it should be clear exactly what is required. I think this item should be struck. The county health department and DEQ is charged with overseeing these things, so I see no reason to include this statement.</p> <p>P.31.2 - Requiring 5,000 gallons of on-site water storage per lot or unit for fire suppression seems arbitrary and costly. An eighty lot (or unit) subdivision will require a 400,000 gallon storage tank which I suspect could easily add \$10,000 per lot if not more. 500 gal per hour is only 8.33 GPM. What if the public water supply can provide this fire flow. The way this is written, the storage is still required. This needs to be looked at to see what the requirements are in other communities around the country to see if there is a more reasonable solution.</p>	<p>Change P.27.6 to: <i>"Encourage best available waste water treatment technology for individual septic systems."</i></p> <p>Change P.31.2 to: <i>"Require new subdivisions to have adequate on-site water capacity and recharge for fire protection."</i></p>
<p>P.27.6 This policy is not needed because it is covered by 27.7</p> <p>P.31.2 5000 gallons/lot is a lot of water. The average water truck used to water roads and fight fires carries 3000 gal or less. You need to rethink this.</p> <p>P.31.6 If people choose to live in remote areas where services are delayed or non-existent that is there business and they must accept the risk. The county could require developers to inform buyers about the level of county services they can expect but the county should not restrict development because of low service levels.</p>	<p>Change P.27.6 to: <i>"Encourage best available waste water treatment technology for individual septic systems."</i></p> <p>Change P.31.2 to: <i>"Require new subdivisions to have adequate on-site water capacity and recharge for fire protection."</i></p> <p>Public safety must be mitigated in all areas of the county. No changes to draft needed.</p>
<p>P.27.6 –This section requires advanced treatment of sewage. This shouldn't be a "blanket" requirement if a standard system works for the intended use. Why require advanced technology for all locations if it is not necessary to adequately treat the effluent? Perhaps advanced technology should be required for certain identified situations, such as proximity to high groundwater areas.</p> <p>P.27.10 – This policy could prevent solutions to</p>	<p>Change P.27.6 to: <i>"Encourage best available waste water treatment technology for individual septic systems."</i></p> <p>Add on end of P.27.10: <i>"Such community systems</i></p>

<p>sewage treatment for remote resort areas or other situations where connection to a municipal wastewater system is not possible. We recommend that this policy be revised to reflect proximity considerations to existing public treatment facilities.</p> <p>G.30 – A school population fluctuates continually so in some situations, it may be unreasonable to mitigate the impacts of prospective enrollments for a temporary or short duration event.</p> <p>P31.2 – This seems unreasonable on a per house basis. A 2,500 gallon requirement may be more reasonable as per the current policy or permit a central water supply system or reservoir based on a 500 to 1,000 gallon per unit requirement. (Not all the homes will burn at the same time and fire personnel would be unable to man each separate tank concurrently.)</p> <p>P31.6 fails to recognize the availability of ALERT for most emergency situations.</p>	<p><i>encourage higher density use of rural lands inappropriately far from community infrastructure.</i></p> <p>Disagree. No changes to draft needed.</p> <p>Change P.31.2 to: “Require new subdivisions to have adequate on-site water capacity and recharge for fire protection.”</p> <p>Disagree. No changes to draft needed.</p>
<p>We need a goal on finances. For example:</p> <p>G.1 Develop innovative funding methods that will support the growth of services and insure that the services required are paid for by the residents being benefited.</p>	<p>See Chapter 9 – Implementation.</p>
<p>I attended the Flathead Lakers Directors Meeting this a.m. and we spent a great deal of time coming up with our recommendations for the growth policy. The high water level in some areas of our valley is of grave concern; however, as technology changes to advance septic and water systems our policy needs to be flexible to allow for this change.</p>	<p>The Goals and Policies in Chapter 7 address this concern. No changes to draft needed.</p>
<p>Allowing dense development only in areas that will be served by public sewer systems.</p> <p>This is as it should be. In fact, I'd love to see all one acre lot subdivisions on some sort of public sewer system. However,</p> <p>Restricting community or public sewer systems that aren't likely to be connected to a municipal treatment facility. Seems extremely narrow in perspective as it insures continual development of and reliance on septic systems rather than encouraging cleaner, more appropriate options.</p>	<p>Agree. No changes to draft needed.</p> <p>Add on end of P.27.10: “Such community systems encourage higher density use of rural lands inappropriately far from community infrastructure.”</p>
<p>Goal.29 Develop a monitoring system that requires septic system owners to have the septic tank pumped every 3 years. A fee should be assessed on new installations to finance the monitoring system.</p>	<p>See P.29.3</p>
<p>Public Facilities and Services The buffer zone around the landfill and various suggestions to reduce the use of the landfill are to be commended,</p>	<p>Thank-you.</p>

as is the excellent section on groundwater protection.	
Glacier Park International Airport We noted the huge increase in the projected use of Glacier Airport, but we did not see a buffer zone to allow for future growth and safety. Perhaps we missed it.	This would be covered by the Glacier Park International Airport Master Plan.
HEALTH AND SAFETY IMPACT: The initial funding for expanded facilities, services and transportation that result from significant increase in high density use is not addressed. A goal and supporting policies must be developed that provides all parties with guidelines that will be used for new development.	See Chapter 9 – Implementation.
Page 90: If the county landfill has at most a 29-year life span, the goal of finding a new landfill should be given a higher priority. A time period of no more than ten years needs to be set to establish a new site or to add acreage to the present landfill.	Prioritizing the implementation methods in the 2006 Growth Policy will be strongly determined by the public and political will and the resources available to the county.
Public sewer systems and up-to-date water treatment facilities are conducive to accommodating higher densities. There is a delicate balance between sewer plant capacity and sewer district residents' notions of "community character". The sewer district may in fact be doing de facto "zoning" in expanding service and density to areas not originally served or contemplated. Periodic surveys of all existing county sewer districts to quantify their service commitments and uncommitted capacity are necessary. Should these districts reserve some of their capacity for future in-fill development on buildable land within their boundaries? Should existing sewer districts expand or should new ones be formed to meet suburban growth centers?	Thank-you for the comment. No changes to draft needed.
Re: Public Services Goal: Efficient & effective wastewater treatment & drinking water delivery Is it possible to suggest the consolidation of Somers Water & Sewer & Lakeside Water & Sewer so coordinated & logical plan for public water & sewer lines can be addressed? Currently, Somers & possibly Lakeside are in moratorium & growth is being delayed due to difficulty in getting water & sewer in Somers area – specifically on Hwy. 82.	See P.27.4 and Chapter 8, P.35.3. See P.29.3, P.27.3 and P27.5.
In my situation, my property borders 19 acres where 22 condominiums are planned. Yes, I think it will ruin the precious views we enjoy daily along with traffic congestion, strains and emergency services, etc. The growth here in Somers seems at times at an overwhelming pace. Can our infrastructure accommodate everyone's needs and Hwy. 93 is still the main artery in town. Will that look like the L.A. freeway?	Thank-you for commenting. No change needed.

<p><u>Chapter 7 Public Facilities and Services</u></p> <p>In the introduction we need to point out that it is just not growth that is driving the increasing cost of services it is also the way we grow. Flathead County is the only large county of around 80k that has such a large percent of rural population. If we had 67% of the county population located in cities and 33% in the county our issues and this growth policy would be much different.</p> <p>We need a goal on finances. For example:</p> <p>G.1 Develop innovative funding methods that will support the growth of services and insure that the services required are paid for by the residents being benefited.</p> <p>Policy- support efforts to establish a county service district for the state.</p> <p>Policy- support efforts to establish a local option tax.</p>	<p>No changes needed.</p> <p>See Chapter 9 – Implementation.</p>
<p>PAGE 82 – P.26.2 –Add “and a plan for acquisition created” after “identified”.</p> <p>PAGE 83 – P.27.2 –Move “physical” to after “limiting”.</p> <p>PAGE 83 – P.27.4 –Change “system” to “plan”.</p> <p>PAGE 84 – P.28.4 –Remove “those that”.</p> <p>PAGE 84 – ADD P.29.5 – “Regulate the collection of and discharge of solids pumped from private septic tanks.” This is regulated by the state, but it is unwise for the county to just assume that no environmental damage is being done under the current system.</p> <p>PAGE 85 – P.31.1 – Add requirement for industrial and commercial uses.</p> <p>PAGE 85 – P.31.5 –Change “Encourage” to “Require”.</p> <p>PAGE 85 – P.31.6 - Change “Encourage” to “Require” and change “ambulance” to “emergency”.</p> <p>PAGE 86 – ADD P.32.5 – “Work with Sheriff’s Department to identify impacts of increased development and population and create mitigation policies.”</p> <p>PAGE 95 – There should be some discussion of the</p>	<p>Disagree. No change to draft needed.</p> <p>Disagree. No change to draft needed.</p> <p>Disagree. No change to draft needed.</p> <p>Agree. Remove “those that.”</p> <p>Disagree. No change to draft needed.</p> <p>This comment is not relevant to particular policy.</p> <p>Subdivision requirements are implemented in the Flathead County Subdivision Regulations.</p> <p>Subdivision requirements are implemented in the Flathead County Subdivision Regulations. Agree. Change “ambulance” to “emergency.”</p> <p>See P.32.4.</p> <p>Staff believes this is covered by the county-wide</p>

<p>benefits of community systems utilizing common collection from individual Level II systems. This could be a very good interim step in avoiding large numbers of standard individual septic systems.</p> <p>PAGE 96 & 97 – Add “Total students enrolled have increased 9% between 1992 and 2005 from 15,528 to 16,956.” In Figure 7.2 add totals to the bottom. I think they are “ 1992 – 15,528----- 2000 – 16,266 -- ----- 2005 – 16,956 -----Change – 9%”.</p> <p>PAGE 102 – The last sentence of the first paragraph about an additional 26 officers being needed. Is this on top of the one additional officer every two years needed to maintain current staffing levels?</p>	<p>management plan.</p> <p>See Appendix A.</p> <p>Please re-read paragraph for clarification. Numbers provided are projections.</p>
<p>Thank you Planning Staff for letting us submit some comments. The education section is very thoroughly done with the addition of Appendix A. My main concern was that school personnel, including this office, simply had to be a part of the subdivision/development process because we have to furnish a quality education and we cannot be an “after-the-fact” consideration. You made the suggestion for our involvement twice. Thank you.</p> <p>Page 85, Policy 30.3 ??? Not sure what you were trying to express here. Needs rewriting.</p> <p>Page 96, PART 3: Education</p> <p>Paragraph 3 Enrollments have fluctuated drastically as the regional demographics of the county have changed. Overall enrollment for all public elementary schools in Flathead County has decreased 4.1% * Enrollment at private elementary schools has increased 35% between 1992 and 2005. Private high school enrollments are also up 19% during the same period. The therapeutic boarding schools continue to have increasing enrollment every year. See Table 7.2 for a summary of Flathead County school enrollment and Appendix A: Baseline Analysis for detailed enrollment statistics. *What span of time are you referring to here? Needs clarifying.</p> <p>Paragraph 4: Development patterns in Flathead County are reflected in school enrollments. As people move into high and medium density areas that are still affordable to families with children, schools add students. Kila, Helena Flats, Evergreen, West Valley, Smith Valley and Swan River reflect this trend. Schools that are likely to add students should be incorporated into the subdivision review process to familiarize both school districts and the public</p>	<p>Thank-you.</p> <p>Add “and” after “district” and strike “<i>determine</i>.”</p> <p>Delete . (period) after 4.1% and add , (comma).</p>

<p>with health and safety issues of expanding enrollment. Existing infrastructure and capacity of schools must be considered. These communities should also identify lands on which future schools could be built and plan for ahead for acquisition. Such planning will ultimately save the taxpayers money and ensure schools are located placed in safe, logical and efficient locations with good access and space for children to safely recreate. Schools can also boost a sense of community as many activities take place in and around public schools. Well-maintained, effective schools are sources of pride in a community and should be prioritized a priority.</p> <p>Paragraph 5: Areas of low density are usually no longer affordable to young families with children. School enrollments are declining in these areas. In extremely rural areas where large tracts may still be affordable such as West Glacier and the North Fork, home schooling is prevalent common. In areas of seasonal residents such as West Glacier, Creston, Fair-Mont-Egan, Cayuse Prairie, Bigfork, Deer Park and Whitefish school enrollments have also decreased.</p>	<p>Agree. Strike for.</p> <p>Disagree. No changes needed.</p> <p>Agree. Change “<i>prioritized</i>” to “<i>a priority</i>.”</p> <p>Disagree. No changes needed.</p>
<p>Add the following POLICY, P.26.4, to GOAL G.26, Draft page 82:</p> <p>EXPLORE AND IMPLEMENT THE NEWEST TECHNOLOGIES FOR THE COLLECTION, PROCESSING AND RECYCLING OF SOLID WASTE IN ORDER TO CONSERVE CAPACITY, ENCOURAGE THE RECYCLING INDUSTRY AND REDUCE COSTS.</p> <p>Additional note: The production of methane gas, for example, that can be sold commercially is a means of offsetting the cost of solid waste disposal. Another example is the processing and sale of vegetation and wood refuse.</p> <p>GOAL G.27, Draft page 82: An excellent Goal and supporting Policies.</p> <p>GOAL G.28, Draft page 83L: An excellent Goal.</p> <p>Amend POLICY P.30.3, Draft page 84, as follows:</p> <p>DETERMINE COMMON CHARACTERISTICS OF DEVELOPMENTS MOST LIKELY TO ADD SCHOOL CHILDREN TO THE LOCAL DISTRICT AND REQUIRE THE DEVELOPER TO MITIGATE THE IMPACT TO THE EXTENT ENABLED BY STATE LAW.</p> <p>Reason for the amendment: State law enables</p>	<p>See P.25.5.</p> <p>Thank-you.</p> <p>Change as follows: Add “<i>and</i>” after “<i>district</i>” and strike “<i>determine</i>.”</p> <p>Prioritizing the implementation methods in the 2006</p>

<p>jurisdictions to require developers to mitigate impacts. No “incentives” for doing so are required or appropriated. The establishment of impact fees must be a top priority.</p> <p>GOAL G.31, Draft page 85: An excellent Goal.</p> <p>Amend POLICY P.31.6, Draft page 85, as follows:</p> <p>REQUIRE SUBDIVISIONS TO...</p> <p>Reason for amendment: This is an issue of public health and safety. Making the policy mandatory promotes health and safety and complies with the state mandate to safeguard these ideals.</p> <p>Add GOAL G._., as follows:</p> <p>ESTABLISH BUILDING CODES AND A COUNTY BUILDING DEPARTMENT WITH AN INSPECTION STAFF TO IMPLEMENT THIS GOAL.</p> <p>Add supporting POLICIES as appropriate, for example:</p> <p>POLICY G._.1: ADOPT A COUNTY BUILDING CODE AND ESTABLISH GUIDELINES AND FEES FOR PROVISION OF PERMITS AND INSPECTIONS.</p> <p>POLICY G._.2: RECRUIT AND TRAIN THE STAFF TO IMPLEMENT THE GOAL.</p> <p>Reason for new Goal: To ensure uniform high quality in the construction industry, to protect the public and to make sure that rules and requirements are followed, a system of permits and inspection is required. This does not constitute “government interference” but is rather a public welfare and safety measure. In fact, failure to establish such a department is an abdication of governmental responsibility. We are no longer living on a frontier. The increasing population and proliferation of building has created challenges that only increased oversight can address. Most responsible jurisdictions throughout the United States have instituted codes and inspections to good effect. They have insured plan compliance, high building standards, greater public safety and have become an integral part of the planning process.</p>	<p>Growth Policy will be strongly determined by the public and political will and the resources available to the county.</p> <p>Thank-you.</p> <p>Subdivision requirements are implemented in the Flathead County Subdivision Regulations.</p> <p>Change “ambulance” to “emergency.”</p> <p>See P.16.6 in Chapter 3.</p>
<p>Chapter 7—Policy 27.10 Public Facilities and Services</p> <p>Comment—This policy restricts community systems if not able to connect to a municipal system. Why? Newer systems, both</p>	<p>Add on end of P.27.10: “<i>Such community systems encourage higher density use of rural lands inappropriately far from community infrastructure.</i>”</p>

private and public are capable of processing effluent that surpasses DEQ standards.	
<p>All quotations used by American Dream Montana (ADM) are directly taken from the draft county growth policy (DCGP). Whenever quote marks are used in this analysis, the statement is a direct quote, goal or policy as stated in the proposed DCGP.</p> <p style="text-align: center;">Chapter 7</p> <p>Page 82, P.27.1</p> <p>ADM comments: Need to be changed. From “Municipal Standards” to “As required by M.D.E.Q.”</p> <p>Page 83, P.27.6</p> <p>ADM comments: This is the responsibility of M.D.E.Q. to determine. Delete</p> <p>Page 83, P.27.9</p> <p>ADM comment: Is arbitrary and not scientifically based. Delete</p> <p>Page 84, P.29.3</p> <p>ADM comments: Who pays? Is this simply a backdoor to the voter rejected “County-wide Water Quality District”? Delete</p> <p>Page 84, P.30.1</p> <p>ADM comments: Does this conflict with State Law that does not allow denial of Subdivisions based only on the impact to schools? Clarify</p> <p>Page 85, P.31.2</p> <p>ADM comments: Is arbitrary and will have significant impact (negative) on affordable housing in rural areas. Delete</p>	<p>Change P.27.1 to: <i>“Encourage high density development in areas that will be served by public sewer systems.”</i></p> <p>Change P.27.6 to: <i>“Encourage best available waste water treatment technology for individual septic systems.”</i></p> <p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Change P.30.1 to: <i>“Encourage developers to coordinate and communicate with school district administrators during the development process.”</i></p> <p>Change P.31.2 to: <i>“Require new subdivisions to have adequate on-site water capacity and recharge for fire protection.”</i></p>
I am most concerned with the language in Goals 27 and 28 and their subsequent policies. I have read the document from the environmental group and I ask that you consider this language in your revisions. This is a legal document and the most serious need in the GP is the need for amendment language so it can be amended in the future.	Thank-you for your comment.
On the topic of population growth and its impact on the environment, the county has the responsibility to address future environmental controls in regard to solid waste. Recycling opportunities are very limited in the valley. I know of other counties that collect more diverse waste for recycling. Future waste management practices should include	See G.25 and accompanying policies.

<p>exploring means to increase recycling opportunities. Private collection businesses in conjunction with the county might develop solutions to make the hauling of these wastes from collection facilities to the processing centers, less of a monetary burden. The county should create incentives to widen the spectrum of materials to be recycled. This would serve to lessen the volume of waste being added to the county landfill while promoting recycling affordability and collection business growth. Now is the time to develop and apply new solutions to minimize solid waste impacts, not later, when we've run out of dedicated waste disposal area, land for landfill facilities, operational area and buffer area.</p>	
<p>No New Wells. Suggestions for new restrictions that may limit the ability of property owners to drill new wells is an infringement on property rights. Refer to Chapter 7. If I need water on my private property that is outside of access to public water and sewer systems, why should I be restricted in drilling a new well? Water is the rural private property owner's most valuable asset. Limiting or eliminating the ability to get water is a taking of that property and its value from the owner. How do provide for compensation? Remove any indication in the policy for limiting new wells.</p>	<p>There is no policy limiting new wells on un-subdivided private property. Please see Chapter 7.</p>
<p>Chapter 7:</p> <p>P.27.10 "Restrict community and public sewer systems which are not subject to future connection to a municipal wastewater system." Private systems can do as good a job as municipal systems. Some areas cannot be reached by municipal systems. The only reason to make a property owner hook up to a municipal system is if there is High-Density in a small area.</p> <p>P.30.1 "Place emphasis on school district's ability to accommodate new students as part of the proposed subdivision review process." May want to check into the legality of this. Would open the County up to more lawsuits.</p>	<p>Add on end of P.27.10: <i>"Such community systems encourage higher density use of rural lands inappropriately far from community infrastructure."</i></p> <p>Change P.30.1 to: <i>"Encourage developers to coordinate and communicate with school district administrators during the development process."</i></p>
<p>Page 82 Policy 27.1 How is public water and sewer treated to municipal standards good? Most municipalities discharge into surface water. Is that what you want them to do? Why don't you make the statement that allows densities do not degrade groundwater as required by DEQ.</p> <p>Page 88 Policy 27.6 This policy needs to be changed. It should read "require technologically advanced wastewater</p>	<p>Change P.27.1 to: <i>"Encourage high density development in areas that will be served by public sewer systems."</i></p> <p>Change P.27.6 to: <i>"Encourage best available waste water treatment technology for individual septic systems."</i></p>

<p>treatment methods for individual septic systems in areas that would be required by the non-degradation analysis required by the DEQ.”</p> <p>Policy 27.9 Land division resulting in residential densities greater than one dwelling unit per five acres should be discouraged in areas of high groundwater of five feet below ground surface or less which are not served by a public sewer district. What happened to community water and sewer systems, not economically feasible on five acre lots? Let the DEQ do their job and dictate this.</p> <p>Policy 27.10 Restrict community and public sewer systems which are not subject to future connection to a municipal wastewater system. –Why? Private systems do just as good or better than municipal systems. This is unreasonable and contradicts with Policy 27.9. Can’t figure out what F.C. really wants.</p> <p>Policy 30.1 Place emphasis on school districts’ ability to accommodate new students as part of the proposed subdivision process. Shouldn’t go here, state law says you cannot deny a subdivision based on its impacts to a school system...</p> <p>Policy 31.2 Require minimum on-site water storage of 5,000 gallons per lot or unit for fire suppression and ensure subdivisions provide a supply of 500 gallons per one hour per lot for fire suppression when needed. Why? This seems extreme. Why would you need so much water? The whole subdivision isn’t going to go up in flames. Is this the wish of the fire departments? Number seems arbitrary.</p>	<p>Add on end of P.27.10: <i>“Such community systems encourage higher density use of rural lands inappropriately far from community infrastructure.”</i></p> <p>Change P.30.1 to: <i>“Encourage developers to coordinate and communicate with school district administrators during the development process.”</i></p> <p>Change P.31.2 to: <i>“Require new subdivisions to have adequate on-site water capacity and recharge for fire protection.”</i></p>
<p>Page 82, Policy 27.1, “Allow dense development only in areas that will be served by public sewer systems that treat to municipal standards.” This policy needs to be changed to read “Allow dense development only in areas that will meet the requirements of the experts of DEQ that prove that the impacts will be non-significant.” This proposed policy shows a lack of knowledge with relation to municipal standards. For example the Kalispell plant directly discharges 9.4 PPM nitrates out of its plant, the Lolo Conventional Secondary Wastewater Treatment directly discharges 22 PPM nitrates out of its plant and the Missoula WWTP in 1992 – Secondary Treatment discharges 21.9 PPM nitrates out of its plant. There is not one set standard, each municipal plant is different. The safe drinking water standard is 10PPM. Municipal treatment plant discharge permits are essentially permits to</p>	<p>Change P.27.1 to: <i>“Encourage high density development in areas that will be served by public sewer systems.”</i></p>

allow a certain amount of pollution. Experts in Sanitation Engineering have concluded that “Decentralized” sewage treatment systems can treat waste water equal to or better than municipal systems. Professional Engineers are the only entity that is authorized to design and practice Civil Engineering with regards to wastewater treatment plant and small sewage treatment systems. The authors of the Growth Policy have no knowledge to write a policy such as this.

Page. 83, Policy 27.6, “Require technologically advanced wastewater treatment methods for individual septic systems.” This policy needs to be changed to read, “Require technologically advanced wastewater treatment methods for individual septic systems where they are needed to protect water quality, such as areas close to surface water or area deemed necessary by the experts at the DEQ.” There is no scientific data that would justify requiring advanced treatment on every septic system. MECA has data on water quality that would refute this proposed policy. While MECA is extremely concerned with water quality in Flathead County, we are also opposed to making people spend money unnecessarily for technology that is not needed. The regulation of septic systems, and sewage treatment systems needs to be left up to the experts at DEQ. Representatives of MECA would be more than willing to work with Flathead County to come up with requirements near surface water to protect water quality.

Page 83, Policy 27.9, “Land divisions resulting in residential densities greater than one dwelling unit per five acres should be discouraged in areas of high groundwater of five feet below ground surface or less which are not served by a public sewer district.” This policy should be changed to read, “Land divisions resulting in residential densities greater than one dwelling unit per five acres should be discouraged in areas of high groundwater unless it is determined that the impact would be insignificant by the experts at DEQ.” MECA does not believe that there is any scientific basis for this policy as written. Where did the arbitrary 5 feet come from? We will state again that decentralized systems can treat to a standard equal or better than municipal systems.

Page 83, Policy 27.10, “Restrict community and public systems which are not subject to future connection to a municipal wastewater system.” This policy needs to be changed to read, “Explore and encourage exploration of new sanitation technology (decentralized systems) without

Change P.27.6 to: “*Encourage best available waste water treatment technology for individual septic systems.*”

According to scientists at the Flathead Lake Biological Station, the area where groundwater is five feet or less from the surface is critically sensitive and no development or gravel mining should occur in this zone. Public comments indicated that prohibiting development in these areas is unreasonable, so staff recommends low density development as a compromise.

<p>burdening strained municipal systems and taxpayers.” We adamantly oppose this policy as written, we believe the existing scientific data refutes this policy. We believe that decentralized systems can treat wastewater better or equal to municipal systems with the technology available today. We believe this policy would also have a negative effect on affordable housing.</p>	<p>Add on end of P.27.10: “<i>Such community systems encourage higher density use of rural lands inappropriately far from community infrastructure.</i>”</p>
<p>ADDITIONAL POLICY Adapted from the 1987 Flathead County Chapter 2 Page 13 Policy 3.15: Suspected areas of failing private sewage disposal systems should be investigated.</p> <p>ADDITIONAL POLICY adapted from the 1987 Flathead County Growth Policy Chapter 4 Page 17 Policy 4.11: Areas no conducive to individual on-site sewage disposal systems because of flooding, ponding, seasonal high water tables, bedrock conditions, severe slope conditions and no suitable access to a community sewage system should be discouraged from development.</p> <p>ADDITIONAL POLICY adapted from the 1987 Flathead County Growth Policy Chapter 4 Page 17 Policy 4.22: Protect and preserve natural drainage ways when possible.</p> <p>ADDITIONAL POLICY adapted from policies submitted to the County planning office and recommended for inclusion in the growth policy by the Long Range Planning Task Force Committee on Natural Resources: Develop an inventory of existing and new systems, entered into a database and GIS system to better understand the location, age and condition of systems and their potential impacts on water resources.</p> <p>ADDITIONAL POLICY adapted from policies submitted to the County planning office and recommended for inclusion in the growth policy by the Long Range Planning Task Force Committee on Natural Resources: Develop a maintenance program which includes mandatory inspection at time of real estate transfer.</p>	<p>Agree. Add P.27.11, “<i>Areas not conducive to individual on-site sewage disposal systems because of flooding, ponding, seasonal high water tables, bedrock conditions, severe slope conditions and no access to a community sewage system should be discouraged from development.</i>”</p> <p>Add P.27.12, “<i>Investigate the feasibility of developing a septic system database.</i>”</p> <p>Disagree. No changes needed.</p>
<p>DRAFT GROWTH POLICY: PUBLIC FACILITIES AND SERVICES CHAPTER 7</p>	
<p>Policy 25.2 Page 82 PUBLIC FACILITIES AND SERVICES CHAPTER 7</p> <p><i>New subdivisions should be encouraged to establish centralized refuse and recycling collection sites within the development when curb-side pick-up is not feasible.</i></p>	<p>Add to P.25.2, “<i>All refuse sites will use standard measures for animal proofing the site.</i>”</p>
<p>RECOMMENDATION:</p>	

Include the following policy Add (New) Policy: Require centralized refuse and recycling collection sites with bear proofing and a established plan for regular maintenance.	
Goal 27 Page 82 PUBLIC FACILITIES AND SERVICE CHAPTER 7 <i>Efficient and effective waste water treatment and drinking water delivery.</i>	
RECOMMENDATION: Goal 27 should be strengthened with the addition of the following policy. Add (New) Policy: <i>Identify, map and project future needs for lands used for the disposal of septic and community sewer wastes for use in land use decisions. Adopt protective measures when warranted to protect water quality and health, safety of residents in the area.</i> (adapted from policies submitted to the county planning office and recommended for inclusion in the county growth policy by Flathead County Friends of Agriculture a local group of agriculture producers)	See all policies under G.27. No changes needed.
Policy 27.1 Page 83 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Allow dense development only in areas that will be served by public sewer systems that treat to municipal standards.</i>	Change P.27.1 to: <i>“Encourage high density development in areas that will be served by public sewer systems.”</i>
RECOMMENDATION: Add the following wording to Policy 27.1 Add (Revised) Policy: <i>Allow dense development only in areas that will be served by public sewer systems that treat to municipal standards and are not limited by storm water issues and/or shallow ground water.</i>	
Policy 27.3 Page 83 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Prepare a comprehensive water quality management plan for the county.</i>	
RECOMMENDATION: In conjunction with this policy, the County should prohibit major subdivisions and commercial development that raise reasonable concerns that they will potentially impact water quality in Flathead County (based upon a recommendation from the Long Range Planning Task Force Committee on Natural Resources).	Staff disagrees. No changes needed.
Policy 27.6 Page 83 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Require technologically advanced wastewater treatment methods for individual septic systems.</i>	
Comment: The county should, similarly, require proof of regular pumping and maintenance of septic tanks. RECOMMENDATION:	Change P.27.6 to: <i>“Encourage best available waste water treatment technology for individual septic systems.”</i>

Add a new policy that would read as follows. <u>Add (New) Policy:</u> <i>Encourage individual property owners to provide proof of regular pumping/maintenance of septic tanks.</i>	
Policy 28.1 Page 83 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Developers should provide evidence that drinking water of sufficient quantity and quality is available in areas of proposed development.</i>	
<u>Comment:</u> Developers should be required to monitor the quality and quantity of drinking water during all phases of development in order to provide cumulative evidence. Similarly, development of property should be phased until evidence has been brought forward that establishes an adequate supply and quality of drinking water.	Staff disagrees. No changes needed.
<u>RECOMMENDATION:</u> Add a new policy in order to provide further protection of water resources. <u>Add (New) Policy:</u> <i>Require developers to monitor the quantity and quality of drinking water during all phases of development.</i>	
Policy 28.2 Page 83 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Promote the installation of community sewer and/or water services in areas where the quantity and/or quality of drinking water resources are threatened.</i>	
<u>RECOMMENDATION:</u> Revise policy 28.2 to read: <u>Add (Revised) Policy:</u> <i>Require the installation of community sewer and/or water services.</i>	The Growth Policy is non-regulatory. No changes needed.
Policy 29.1 Page 84 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Areas of higher susceptibility to impacts from septic systems due to soils, depth to groundwater, proximity to sensitive surface waters, topography, and/or density of development should be identified as special consideration areas. New development in these areas should be limited.</i> <u>Comment:</u> These areas should be identified and visually represented on a county map in order to provide adequate guidance for new developments.	See Chapter 9 – Implementation. No changes needed.
<u>RECOMMENDATION:</u> Include the following language in Policy 29.1 <u>Add (Revised) Policy:</u> <i>...and/or density of development should be identified and mapped as special consideration areas.</i>	
Policy 31.3 Page 85 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Support mutual aid agreements between rural and</i>	

<i>municipal fire districts.</i>	
<p><u>RECOMMENDATION:</u> Add the additional wording to Policy 31.3 in order to provide greater direction for new development.</p> <p><u>Add (Revised) Policy:</u> All subdivisions shall be included in a regulated and established fire district.</p>	See P.31.3(b). Policies need to be renumbered in this section.
<p>Policy 31.5 Page 85 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Encourage multiple subdivision access points in areas of high and extreme fire hazard.</i></p>	No changes needed.
<p><u>Comment:</u> Many subdivisions are not developed with adequate space for emergency vehicles (specifically fire trucks) to access individual houses and properties, as well as exist space for residents in cases of extreme emergency.</p>	
<p><u>RECOMMENDATION:</u> Add additional wording to Policy 31.5 in order to provide a foundation for subdivision regulations.</p> <p><u>Add (Revised) Policy:</u> Require multiple accesses spaced so as to provide safe and clear options for exist in case of fire.</p>	
<p>Policy 32.2 Page 85 PUBLIC FACILITIES AND SERVICES CHAPTER 7 <i>Increase the current ratio of 0.41 patrol officers per 1,000 residents to one full patrol officer per 1,000 residents to meet the growing number of calls for assistance.</i></p>	
<p><u>Comment:</u> The county should work to meet national standards for patrol officer ratios if this national standards are higher.</p>	Staff disagrees. No changes needed.